

# INSTRUCTIONS FOR RESPONSES TO INFORMATION REQUESTS OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits the following Information Requests to Massachusetts Competitive Local Exchange Carriers (“CLECs”) in D.T.E. 03-60.

## **Instructions**

The following instructions apply to these Information Requests issued to all Massachusetts CLECs as part of this proceeding.

1. To the extent that any of the attached information requests are not applicable to the telecommunications service provided by you in Massachusetts, please so indicate in your response.
2. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number and the name of the person responsible for the answer.
3. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
4. These requests shall be deemed continuing so as to require further supplemental responses if the petitioner or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
5. The term “provide complete and detailed documentation” means:  
  
Provide all data, assumptions, and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
6. The term “document” is used in the broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
7. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
8. Please serve one (1) copy of the responses to Mary Cottrell, Secretary of the Department, and one (1) copy to Paula Foley, Hearing Officer. Parties to D.T.E. 03-60 seeking access to this information must certify compliance with the Protective Order adopted in this proceeding. Unauthorized disclosure, or the use of this information for competitive commercial or business purposes by any party to D.T.E. 03-60, will constitute a violation of

the Protective Order.

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY  
D.T.E. 03-60  
QUESTIONS TO MASSACHUSETTS CLECS

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TRANSPORT

1. Provide a list of all the incumbent local exchange carrier ("ILEC") wire centers in Massachusetts to which you have deployed your own transport facilities (i.e., any facilities that, directly or indirectly, provide connections to wire centers) or are currently in the process of deploying such facilities.
2. Provide a list of all the ILEC wire centers in Massachusetts to which you have obtained transport facilities (i.e., any facilities that, directly or indirectly, provide connections to wire centers) from a supplier other than the incumbent LEC (including wholesale providers and non-certificated providers, and the names of such providers).
3. For each ILEC wire center or pair of ILEC wire centers identified in your previous responses (questions 1 and 2) state the amount of capacity (e.g., DS-1, DS-3) obtained on each route and the level of capacity the facility is capable of supporting.
4. Provide a list of all ILEC wire centers in Massachusetts in which you offer transport facilities to other carriers, and for each identify the capacity or type of transport you offer (e.g., DS1, DS3, or dark fiber).
5. State whether you are affiliated with the ILEC in any way or with any other carrier (including intermodal providers) that serves the same transport route. If so, please describe the affiliation.
6. Identify the points within Massachusetts at which you connect your local network facilities to the networks of carriers other than the incumbent LEC, including interconnection with other CLECs, interexchange carriers, or internet service providers at any point of presence ("POP"), network access point ("NAP"), collocation hotel, data center, or similar facility.
7. Provide a list of all fiber rings in Massachusetts you own or control and identify the location (by street address and/or V&H coordinates) of each add-drop multiplexer or comparable facility for connecting other transport facilities (e.g., wire centers, loops, other fiber rings) to the fiber ring.
8. Provide a list of all ILEC wire centers in Massachusetts at which you connect a collocation arrangement to a facility or collocation arrangement belonging to another carrier, and for each, identify the carrier and the capacity or type of connection.
9. State whether you have any long-term (10 or more years) dark fiber IRUs (i.e.,

indefeasible right of use) between any two central offices in the same LATA, in which you maintain an active physical collocation arrangement.

10. If the above question is answered in the affirmative, please answer the following. As to each pair of central offices, identify:
  - a. The common name, address and CLLI code for each pair of central offices,
  - b. The number of dark fiber pairs terminating at each of the physical collocation facilities,
  - c. Whether the facilities have been lit by the carrier attaching its own optronics, and if so, the transmission level of each such lit circuit, and
  - d. The term of the IRU.

### LOOPS

11. Please provide a list of customer locations where you deploy your own, or are in the process of deploying, DS1 and DS3 loop facilities, and where you provide dark fiber that you either own or obtain through an IRU. For each location, identify the address, the number of facilities and corresponding capacity, and nature of the loop.
12. For each facility identified in the previous response, indicate whether you are providing the facility to yourself, or on a wholesale basis to another unaffiliated service provider. If providing facilities on a wholesale basis, indicate the names of such unaffiliated service providers.
13. Please identify whether you are affiliated in any way with Verizon or any other carrier (including intermodal providers) that provides loop facilities to any of the locations identified in the above response, and describe any such affiliation.

### SWITCHING

14. Provide a list of all switches that you currently use to provide a qualifying service (as defined in 47 C.F.R. § 51.5, as that section will be amended by the Final Rules issued by the FCC pursuant to the Triennial Review Order) anywhere in Massachusetts, regardless of whether the switch itself is located in Massachusetts. Do not include Verizon switches utilized by you on an unbundled basis or through the resale of Verizon services at wholesale rates.
15. Identify each Verizon wire center district (i.e., the territory served by a Verizon Massachusetts wire center) in which you provide qualifying service to any end user customers utilizing any of the switches identified in your response to the above question. Wire centers should be identified by providing their name, address, and CLLI code.

16. For each ILEC wire center identified in response to question 15, identify the total number of voice-grade equivalent lines you are providing to customers in that wire center from your switch(es) identified in response to question 14. For purposes of this question, "voice-grade equivalent lines" should be defined consistent with the FCC's use of the term. See, e.g. FCC Form 477, Instructions for the Local Competition and Broadband Reporting Form.
17. With respect to the voice-grade equivalent lines identified in response to the above question, separately indicate the number being provided to: (a) residential customers; (b) business customers to whom you provide only voice-grade or DS0 lines; and (c) business customers to whom you provide DS1, ISDN-PRI, or other high capacity lines. For purposes of this question, "high capacity" means DS1 or equivalent, or higher capacity lines, including, but not limited to DS1, ISDN-PRI, DS3, OCn.
18. With respect to the voice-grade equivalent lines identified in response to the above question, indicate the types of loops over which they are being provided (e.g., an unbundled loop leased from the incumbent LEC, a copper or fiber loop leased from a third party, a self-supplied copper or fiber loop, or a coaxial cable loop).
19. For each of the switches identified in your response to question 14, state whether the switch is owned by you, or whether you have leased the switching capacity or otherwise obtained the right to use the switch on some non-ownership basis. If the facility is not owned by you, identify the entity owning the switch and (if different) the entity with which you entered into the lease or other arrangement, identify the nature of the arrangement, and state whether such entity or entities are affiliates of yours, in the sense defined in ¶ 408 n.1263 of the Triennial Review Order.
20. Provide a list of all switches from which you offer or provide switching capacity to another local service provider for use in providing qualifying service anywhere in Massachusetts.